

1 Spencer C. Skeen CA Bar No. 182216  
spencer.skeen@ogletree.com  
2 Tim L. Johnson CA Bar No. 265794  
tim.johnson@ogletree.com  
3 Jesse C. Ferrantella CA Bar No. 279131  
jesse.ferrantella@ogletree.com  
4 Cameron O. Flynn CA Bar No. 301830  
cameron.flynn@ogletree.com  
5 OGLETRÉE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
4660 La Jolla Village Drive, Suite 900  
6 San Diego, CA 92122  
Telephone: 858.652.3100  
7 Facsimile: 858.652.3101

8 Attorneys for Defendants WORLD FINANCIAL GROUP INSURANCE AGENCY, INC. and  
9 WORLD FINANCIAL GROUP, INC.

10 *[Additional counsel on signature page]*

11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**

13  
14 TRICIA YEOMANS, ISMAIL CHRAIBI,  
ADRIAN RODRIGUEZ, ROBERT  
15 JENKINS, DOROTHY JENKINS,  
CAMERON BRADFORD and FATEMEH  
16 ABTAHI individually and on behalf of all  
others similarly situated and aggrieved,

17 Plaintiffs,

18 v.

19 WORLD FINANCIAL GROUP  
20 INSURANCE AGENCY, INC., a California  
corporation; WORLD FINANCIAL GROUP,  
21 INC., a Delaware corporation; and DOES 1 to  
100, inclusive

22 Defendants.  
23  
24  
25  
26  
27  
28

Case No. 3:19-cv-00792-EMC

**JOINT STIPULATION TO CONTINUE  
PENDING DEADLINES AND HEARING  
DATES [DKT. 135]**

1 MARLIN & SALTZMAN, LLP  
Stanley D. Saltzman (SBN 90058)  
2 Karen I. Gold (SBN 258360)  
29800 Agoura Road, Suite 210  
3 Agoura Hills, California 91301  
Phone: (818) 991-8080  
4 Fax: (818) 991-8081  
ssaltzman@marlinsaltzman.com  
5 kgold@marlinsaltzman.com

6 ROSENBERG, SHPALL & ZEIGEN, APLC  
David Rosenberg (SBN 99105)  
7 Chad F. Edwards (SBN 308909)  
Bernardo Heights Corporate Center  
8 10815 Rancho Bernardo Road, Suite 310  
San Diego, California 92127  
9 Phone: (619) 232-1826  
Fax: (619) 232-1859

10 FARNAES & LUCIO, APC  
11 Malte Farnaes (SBN 222608)  
Christina Lucio (SBN 253677)  
12 2235 Encinitas Blvd., Suite 210  
Encinitas, California 92024  
13 Phone: (760) 942-9430  
Fax: (760) 452-4421

14 Attorneys for Plaintiffs, individually and on behalf of all others similarly situated and aggrieved  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 The Parties to the above-entitled action, through their attorneys, stipulate and agree:

2 WHEREAS, on September 2, 2022, this Court set these deadlines: (1) completion of  
3 private mediation (“by the end of March 2023”); (2) Plaintiffs’ Motion for Class Certification  
4 (May 15, 2023); (3) hearing on Plaintiffs’ Motion for Class Certification (August 3, 2023); and  
5 (4) Further Status Conference (September 5, 2023). (Dkt. 135).

6 WHEREAS, the Parties have been engaged in extensive written discovery and deposition  
7 practice over the past six (6) months;

8 WHEREAS, this process has taken many months in light of: (1) the large volume of  
9 documents requested; (2) the large number of electronic devices (*i.e.* computers, cell phones,  
10 iPads, tablets, etc.) and cloud-based accounts (email, text, etc.) requiring preservation,  
11 collection, and production; (3) the various locations of the electronic devices; (4) numerous  
12 technical difficulties encountered by Plaintiffs while attempting to access several of these  
13 devices and accounts, which have resulted in significant production delays; and (5) further  
14 delays resulting from extended collection, processing, review and production time required in  
15 light of the volume of data and documents;

16 WHEREAS, Defendants initially scheduled Plaintiffs’ depositions in fall 2022. The parties  
17 then postponed these dates to late 2022 given the above document production delays. To date, the  
18 Defendants have deposed certain Plaintiffs, including Tricia Yeomans, Dorothy Jenkins, and  
19 Cameron Bradford in November and December 2022. However, given the above issues, the Parties  
20 have had to postpone other Plaintiffs’ depositions further, as Plaintiffs experience continued  
21 delays in their document production (largely due to outside vendors assisting with collection) and  
22 have yet to complete their production;

23 WHEREAS, Plaintiffs have been providing regular updates to Defendants regarding the  
24 status of the document production. In an effort to avoid further delays, Plaintiffs have been providing  
25 rolling productions to Defendants over the past several months, with some documents still pending;

26 WHEREAS, the Parties have agreed in principle to participate in additional informal  
27 discovery once Plaintiffs’ document production is complete;

28

WHEREAS, the Parties are working to schedule further depositions, including the remaining Plaintiffs' depositions and 30(b)(6) deposition(s);

WHEREAS, the Parties had to continue the initial mediation date in light of the discovery challenges, and the next available date that worked for the parties and the mediator, Mark Rudy, Esq., is September 28, 2023, which the Parties have secured;

WHEREAS, based upon their meet and confer efforts and to allow the Parties to focus on the mediation discussed above, the Parties agree (subject to Court approval) to continue the deadlines listed in (Dkt 135) as follows:

DEADLINE	DATE
Deadline to complete private mediation	October 6, 2023
Plaintiffs' Motion for Class Certification	December 22, 2023
Defendants' Opposition to Motion for Class Certification	February 9, 2024
Plaintiffs' Reply in Support of Motion for Class Certification	March 29, 2024
Hearing on Motion for Class Certification	April 29, 2024, or any date thereafter convenient for the Court
Further Status Conference	June 28, 2024, or any date thereafter convenient for the Court

IT IS HEREBY STIPULATED that, pending this Court's approval, the above identified deadlines shall be adopted by this Court. The Parties shall complete private mediation by October 6, 2023. Plaintiffs' Motion for Class Certification shall be filed on or before December 22, 2023. Defendants' Opposition to the Motion for Class Certification shall be filed on or before February 9, 2024. Plaintiffs' Reply in Support of the Motion for Class Certification shall be filed on or before March 29, 2024. The hearing on the Motion for Class Certification shall be set for April 29, 2024, or any date thereafter that is convenient for the Court. A further Status Conference shall be set for June 28, 2024, or any date thereafter that is convenient for the Court. The Parties will file a Joint Status Conference Statement at least five (5) days prior to the Status Conference. This stipulation shall not be construed as a waiver of any Parties' rights to later seek modification of this schedule, subject to Court approval.

*[Signatures on next page]*

1 DATED: February 8, 2023

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

3  
4 By: /s/ Tim L. Johnson  
Tim L. Johnson  
Attorneys for Defendants

6 DATED: February 8, 2023

MARLIN & SALTZMAN

8 By: /s/ Karen I. Gold  
Karen I. Gold  
Attorneys for Plaintiffs

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I certify that the content of this document is acceptable to Karen I. Gold, counsel for Plaintiff, and that I have obtained Ms. Gold's authorization to affix her electronic signature to this document.

By: /s/ Tim Johnson  
Tim Johnson

**CERTIFICATE OF SERVICE**

I certify that on February 8, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Notice of Electronic Filing.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 8, 2023.

By: /s/ Tim Johnson

Tim Johnson